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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

KRISTIN K. MAYES, CHAIRMAN

GARY PIERCE

PAUL NEWMAN

SANDRA D. KENNEDY

BOB STUMP

IN THE MATTER OF THE NOTICE OF
PROPOSED RULEMAKING REGARDING
ELECTRIC ENERGY EFFICIENCY RULES

DOCKET NO. RE-00000C-09-0427

COMMENTS OF ARIZONA MUNICIPAL
POWER USERS' ASSOCIATION ON
PROPOSED ENERGY EFFICIENCY RULES

Arizona Municipal Power Users' Association by and through its Executive
Secretary submits the following comments to the 2020 objective of the Commission.

The American Public Power Association, a 2,000 member municipal utility
organization, has determined through extensive research that achieving a 20% improvement
on efficiency by its member utilities by 2020 is impossible.

Additionally, municipal and cooperative member owned utilities do not need
incentives for efficiency since the goal of lowering consumer electric costs is always the utility
goal and management needs no further incentive to more effectively and efficiently and better
serve the member-owner.

DATED this 13th day of November, 2009.

ARIZONA MUNICIPAL POWER USERS'
ASSOCIATION

By:

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Arizona Corporation Commission

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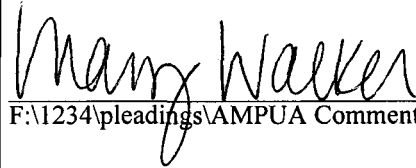
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1 PROOF OF AND CERTIFICATE OF MAILING

2 I hereby certify that on this 13th day of November, 2009, I caused the foregoing
3 document to be served on the Arizona Corporation Commission by delivering the original and
4 thirteen (13) copies of the above to:

5 Docket Control
6 Arizona Corporation Commission
7 1200 West Washington
8 Phoenix, Arizona 85007

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10 F:\1234\pleadings\AMPUA Comments 11-13-09.doc